

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
VICTORIA DAVIS
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc. and Actavis LLC. I make this Certification based on personal knowledge and in support of the Defendants' Joint Motion to Exclude Opinions of Edward H. Kaplan, M.D.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Edward H. Kaplan, M.D., dated November 10, 2021, with Exhibits A-B served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of Edward H. Kaplan, M.D., in MDL 2875, dated January 19, 2022, with errata.

4. Attached hereto as Exhibit C is a true and accurate copy of “Lessons Learnt From Presence of N-nitrosamine Impurities in Sartan Medicines,” published by the European Medicines Agency on June 23, 2020, available at: https://www.ema.europa.eu/en/documents/report/lessons-learnt-presence-n-nitrosamine-impurities-sartan-medicines_en.pdf (last accessed on April 26, 2022).

5. Attached hereto as Exhibit D is a true and correct copy of the report of defendants’ expert Ursina R. Teitelbaum, with Ex. A-C, served in this matter on January 12, 2022.

Dated: April 26, 2022

Respectfully submitted,

/s/ Victoria Davis Lockard
Victoria Davis Lockard

CERTIFICATE OF SERVICE

I, Kate Wittlake, an attorney, hereby certify that on April 26, 2022, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF.

/s/ Kate Wittlake
Kate Wittlake